

**REMARKS**

In the Office Action, claims 1-10 and 23-40 remain withdrawn. Claims 11-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent 4,564,945 to Glover, et al. (Glover) in view of the United States Patent 5,392,299 to Rhines, et al. (Rhines).

In this Amendment, Applicants have amended claim 11 and have not added or amended any other claim. Accordingly, claims 11-22 will remain pending in the application upon entry of this Amendment.

**Rejection of Claims 11-22 under §103(a)**

Claims 11-22 were rejected under §103(a) as being unpatentable over Glover in view of Rhines. Claims 12-22 are dependent on claim 11. Claim 11 recites a method that encodes a block of data. The block of data has n-dimensions and is received from an input source. The block contains several information bits. The method receives a row of the block and immediately outputs the row. The method encodes the information bits in the row. A first set of encoded data is generated according to a first encoding scheme. The method outputs the first set of encoded data. The method encodes the information bits in a column according to a second encoding scheme. A second set of encoded data is generated and iteratively updated according to the information bits in the row. The method hyper-diagonally encodes the information bits in the block according to a parity encoding scheme. A hyper set of encoded data is generated according to:

- the information bits in the row,
- the information bits in the column,
- the first set of encoded data, and
- the second set of encoded data.

The method outputs the second set of encoded data after all the information bits and all subsequent first sets of encoded data are outputted. The method outputs the hyper set of encoded data.

Applicants respectfully submit that Glover, Rhines, and their combination do not disclose, teach, or even suggest such a method. For instance, the cited portions of Glover describe Reed/Solomon redundancy bytes as rows and columns to be appended to the original data block field, while the cited portions of Rhines explain how code symbols are

to be appended to an orthogonal-interleaved data plane. As such, neither Glover nor Rhines disclose, teach, or even suggest hyper-diagonally encoding information bits in a block according to a parity type encoding scheme, thereby generating a hyper set of encoded data according to the information bits in the row, the information bits in the column, the first set of encoded data, and the second set of encoded data, as particularly recited in element "e" of claim 11.

Moreover, Applicants respectfully submit that claim 11 recites (in steps a, b, c, d, e, f, and g) a sequence of steps that include receiving, encoding, and outputting encoded data. In contrast, Glover, Rhines, and the combination of Glover and Rhines do not disclose, teach, or even suggest such particular sequence recited in claim 11.

Accordingly, Applicants respectfully submit that Glover, Rhines, and the combination of Glover and Rhines do not anticipate or otherwise render unpatentable claim 11. Since claims 12-22 are dependent on claim 11, Applicants respectfully submit that the cited references do not invalidate claims 12-22 for at least the reasons discussed above in relation to claim 11. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the §103(a) rejection of claims 11-22.



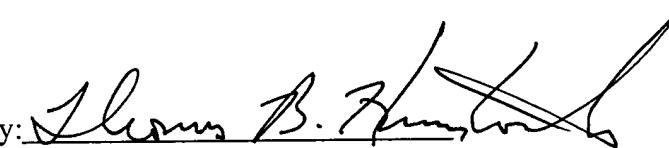
PATENT  
Attorney Docket No.:AHA-02101

## CONCLUSION

Applicants respectfully submit that all pending claims, namely claims 11-22, are in condition for allowance. Reconsideration of the rejection is requested. Examination and allowance are earnestly solicited at the earliest possible date. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,  
HAVERSTOCK & OWENS LLP

Dated: 6-26-06

By:   
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### CERTIFICATE OF MAILING (37 CFR§ 1.8(a))

I hereby certify that this paper (along with any referred to as being attached or enclosed) is being deposited with the U.S. Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to the: Commissioner for Patents, P.O. Box 1450 Alexandria, VA 22313-1450

HAVERSTOCK & OWENS LLP.  
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